Unitil
Unitil Service Corp.

September 21, 2005

VIA HAND-DELIVERY

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd floor
Boston, MA 02110

Re: Investigation by the Department Regarding Service Quality Guidelines Established in Service Quality Standards for Electric Distribution Companies and Local Gas Distribution Companies, D.T.E. 04-116

Responses to Record Requests

Dear Secretary Cottrell:

Enclosed for filing on behalf of Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil"), please find an original and one (1) copy of Unitil's responses to the Department's first set of information requests in the above-referenced docket. Copies of Unitil's responses are being sent by e-mail to the parties. Please note that in response to Record Request No. 6, due to its size, Unitil is providing a hard copy of its Gas System Operations & Maintenance Manual only to the Department and the Attorney General. Unitil will, however, provide copies of this document to other parties upon request.

Thank you for your attention to this matter.

Sincerely,

Gary Epler

Enclosure

cc: Jody M. Stiefel, Hearing Officer

Gary Epler
Senior Attorney

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Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Service Quality Guidelines
Docket No: D.T.E. 04-116
Department Staff's First Set of Record Requests

Record Request No. DTE-1-3

Please provide a comparison of offsets and penalties under the current Service Quality Index and the proposed IEEE standard.

Response:

Under the present MDTE reliability reporting guidelines, events affecting more than 15% of the customers (or other catastrophic event criteria) are excluded from SAIDI and SAIFI performance in the service quality filing.

The IEEE 1366-2003 Guide for Electric Power Distribution Reliability Indices establishes a "Major Event Day" methodology to segregate exceptional events from otherwise normal reliability performance data. Under the IEEE 1366-2003 methodology, data is segregated into two groups: 1) routine, day-to-day activity, and 2) Major Event Days (MEDs). The MED methodology segregates days where events cause the daily SAIDI performance to exceed 2.5 standard deviations above the average daily performance (hence, "2.5 beta"). The MED threshold includes both number of customers and outage durations in the statistical analysis.

In 04-116 DTE-A 1-4, UNITIL stated that the IEEE methodology is arguably a more objective, mathematical approach to normalizing reliability data, since the exceptional events that are segregated from the data are statistically extreme by definition. Unitil also recognizes that the threshold of this data segregation is scaled to the individual utility system's own established performance. Unitil has taken the opportunity to make a preliminary comparison of the IEEE 1366-2003 Major Event Day methodology to the current MDTE exclusionary criteria for a historical data set (see attachments).

The first observation is Unitil can only go back as far 1992 for historical outage data to evaluate the five-year basis for setting the MED threshold (T_{MED}) used to apply to ensuing data. As a result, strict application of the IEEE method for determining MEDs can only begin with 1997 (based on 1992-1996 daily SAIDI averages and standard deviation). From this, only four of the five years are available from the 1996-2000 period on which present benchmark and penalty levels are based. Two approaches were taken to evaluate alternate benchmark and penalty levels under the IEEE method for the same period. First was to use only a four-year benchmark and penalty basis (1997-2000). Second was to infer results of the IEEE method for 1996 performance, and then use the full five-year (1996-2000) basis. In each approach, there were slight differences in the results.

The next observation is that there were significantly fewer Major Event Days resulting from application of the IEEE methodology as compared to the present MDTE Excludable Major Event criteria. In each year of the past nine years through 2004, Unitil has experienced at least one (1) MDTE Excludable Major Event, and as many as five (5). The average has been approximately 3.1 MDTE Excludable Major Events annually. In

contrast, the application of the IEEE methodology identifies a maximum of three (3) MEDs for any given year in the same period, with none in some years, and averaging roughly one (1) MED annually.

It is notable that out of the ten (10) IEEE MEDs that Unitil identified in its preliminary analysis back to 1996, only one was not also an Excludable Major Event under the MDTE criteria.

Another observation is that the SAIDI and SAIFI benchmarks and penalty thresholds resulting from application of the IEEE method may be at higher absolute, numerical levels than with the MDTE exclusionary criteria. This is not unexpected, since less data may be eliminated from the summation (see above). These higher benchmark and penalty quantities may appear to be setting an expectation of worse performance, but should not be construed this way. Actual customer experience is unaffected under either method.

It was observed that the bandwidth between the benchmark and penalty threshold (essentially, the absolute magnitude of the historical standard deviation) may widen with the application of the IEEE method. Also, it is noted that penalty offset thresholds may be similarly lowered, making offsets more challenging to achieve if one assumes that the likelihood of experiencing superior performance to this degree is not the same as the possibility of poor performance to the same deviation.

The IEEE 1366-2003 methodology provides a mathematical approach to segregating data based upon day-to-day and MED performance. This approach will have an affect on historical benchmarks, which would need to be reset. Unitil is assuming that if the IEEE 1366-2003 methodology is accepted, the benchmarks would be set in much the same way they are today. These benchmarks would not change every year.

It is important to understand that the IEEE 1366-2003 "2.5 beta" calculation for MED thresholds is updated every year using an advancing five-year historical basis. Every year, the MED threshold is recalculated from the most recent five year historical performance, and Unitil supports this aspect of the method. However, Unitil would be concerned about changing the time period upon which MDTE sets benchmarks. It is our understanding that any consideration of changing the historically benchmarking period (i.e. 1996-2000) is a different question from the use and application of the IEEE MED method, and would be given due discussion separately.

Finally, Unitil is concerned about implementing new criteria for segregating reliability performance data without having further discussion and study of the implications. Unitil recommends formulating a working group to explore all issues surrounding the IEEE 1366-2003 methodology before a final decision is made.

Person Responsible: Kevin Sprague **Date:** September 21, 2005

Commonwealth of Massachusetts
Department of Telecommunications and Energy
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Record Request No. DTE-1-5

Please provide an analysis of the proposed change in the definition of momentary outage from "less than one minute" to "less than five minutes."

Response:

Unitil has reviewed its trouble interruption report database. There were 4 events that resulted in an outage that lasted longer than 1 minute, but less than 5 minutes. Two of these events were the result of planned outages and are already excluded under the present MDTE criteria. The other two events were the result of having to take equipment out of service due to equipment problems. Because these two events affected only a few customers, there would have been no significant change in the reported reliability results.

Accordingly, the proposed change in definition of a momentary outage from less than 1 minute to less than five minutes will likely have very minimal impact on Unitil's reporting at the present time. However, Unitil notes that some automated sectionalizing schemes may have an overall duration of greater than one minute.

Person Responsible: Kevin Sprague **Date:** September 21, 2005

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Investigation Into Service Quality Guidelines
Docket No: D.T.E. 04-116
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Record Request No. DTE-1-6

Please provide a copy of each company's (both gas and electric companies, as applicable) repair, maintenance and inspection guidelines or procedures for underground and overhead facilities.

Response:

See attachments Unitil Operations Bulletin #OP 6.00, Distribution Inspections and Unitil Gas System Operations & Maintenance Manual.

Person Responsible: Chris Dube and Chris Leblanc **Date:** September 21, 2005

Unitil

Operations Bulletin #OP6.00

SUBJECT: Distribution Inspections

EFFECTIVE: 09/01/05

ISSUED BY: Raymond A. Letourneau
Director of Operations

1.0 PURPOSE

- To provide a uniform method for maintaining and inspecting overhead and underground distribution systems
- To ensure compliance with applicable regulatory requirements
- To ensure the integrity of the poles and equipment
- To ensure the safe operation of the distribution system
- To establish requirements for record keeping and performance measures

2.0 SCOPE

These maintenance guidelines apply to the electric distribution systems and provide the framework for a structured inspection and reporting process. In addition, it is the responsibility of all employees, in the everyday course of their work, to promptly report any abnormalities of the electric distribution system which may compromise public safety or the integrity of the system.

3.0 MAINTENANCE – FREQUENCY AND CATEGORY SUMMARY

Annual Inspection

- Underground Network or Primary Distribution System – a visual inspection to be performed annually.

Five-Year Public Safety Inspection

- Underground Distribution Facilities – A visual safety inspection of underground equipment to be performed every five years.

Ten-Year Public Safety Inspection

- Overhead Distribution – A visual safety inspection of overhead distribution systems to be performed every ten years.

Ten-Year Pole Test - Distribution pole test to be performed every ten years.

4.0 FREQUENCY AND CATEGORY DESCRIPTIONS

4.10 Annual Inspection (Manhole System)

A visual Inspection of all exposed components located in a manhole and/or vault shall be made at least once a calendar year. In conjunction with the visual inspection a comparative temperature check will be performed on all connections.

- Prior to entering the manhole, a test will be performed to determine if there is a presence of elevated voltages on the manhole cover and/or equipment in a close proximity of the manhole.
- The visual inspection shall consist of an examination of the condition of the electrical system, equipment, tagging, and the interior of the structure.
- Annually, preferably during circuit peak periods, a comparative heat check between phases will be performed on all connections. Heat checks may be conducted more often depending upon the load characteristic of the circuit.
- Manhole and/or vaults may be checked more often for water problems depending upon rainfall or melting snow.

4.20 Five-Year Public Safety Inspection (Underground Distribution Facilities)

A public safety inspection of company owned underground equipment shall be performed on a five-year cycle because of the proximity and accessibility to the public. A visual observation of above-grade equipment shall identify any potential public safety concerns, as well as conditions affecting service and reliability.

- Signage

Warning signs/decals shall be in place on all fences, above-grade secondary splice boxes and pad mounted equipment including transformers, sectionalizers and switching cabinets.

- Security

Padlocks, one time locks and penta head locking bolts, where provided for shall be installed and used on all secondary splice boxes and pad-mounted equipment.

- Condition

The condition of the pad, pad-mounted equipment and secondary splice boxes shall be observed with particular attention paid to location of the equipment on the pad, the grade level surrounding the pad, and the general physical condition of the unit.

Specific attention shall be noted to the following items:

- Properly alignment on pad.
- No holes
- Free of rust
- No visible oil leaks
- No excessive gap or spaces in cabinet doors.
- Proper clearance from buildings, roads, fences.
- Traffic barriers in place if required.
- Proper vegetation clearance.

4.30 Ten-Year Public Safety Inspection (Overhead Distribution Facilities)

Overhead distribution facilities shall be visually inspected every ten-years to identify potential failure, deterioration of construction, unsafe conditions or possible public safety hazards.

Specific attention shall be noted to the following Items:

- Wires' passing through trees to the extent that someone working in, or climbing the tree, might be unaware of the presence of the wires.
- Low or overhanging wires, in areas that could contact or be contacted by buildings, ladders, vehicles, etc.
- Damaged or deteriorated equipment such as cross-arms, insulators, terminators, etc.
- Climbing steps or standoff brackets on poles located lower than eight (8) feet above grade or the nearest surface from which climbing would commence.
- Construction activity, which might encroach on areas, occupied by company facilities or changes in the use of land, roads, or buildings.
- Massachusetts Department of Public Works requires that utility poles adjacent to state maintained highways, which are located within six (6) feet of the edge of a traveled way, and not protected by guardrails will have reflective markers mounted on or attached to the pole. The reflector will be located on the pole in such a manner that they are visible to on-coming traffic.

- Foreign attachment to Company equipment that would cause potential danger to the public or Company personnel.

4.40 Ten-Year Pole Test

On a ten-year cycle, wood distribution poles in the DOC's maintenance area shall be visually inspected and tested at and below grade level to determine the soundness of the wood.

Wood Pole Maintenance Procedures

The purpose of this section is to identify destructive forces that affect wood poles. The following outlines a replacement program based on periodic tests to confirm the presence and determine the degree of the decay.

Destructive Forces

One of the most destructive forces affecting wooden poles is decay. It will generally progress at a predictable rate and its advance can be readily diagnosed in the field at all but the very early stages. Detection of decay or damage is essential in establishing the remaining pole life.

Types of Decay

Internal Decay

Internal deterioration of treated poles is due very largely to development of checks after treatment that exposes the untreated center portion of the pole to fungi and insects.

External Decay

External Decay results from using poor preservative or from a low absorption of the preservative by the timber. In older poles, external decay is a consequence of gradual loss of most of the preservative in the sapwood through leaching, evaporation, and chemical change. In butt-treated cedar poles, a softening of the sapwood known as "shell rot" occurs in the upper untreated portion of the pole. Such decay starts in the inner sapwood where air and moisture conditions promote fungus growth, and eventually extends to the outer sapwood.

Groundline Decay

In most cases, the first occurrence of decay will be just below the groundline. This is where the conditions of moisture, temperature, air, and the absence of direct sunlight are most favorable to the

growth of fungi. This is a portion of the pole usually hidden from view and it is close to the natural breaking point of a pole under strain. This is the most critical part of the pole and warrants special inspection.

Detection of Decay

Two methods are generally used to determine the presence and the degree of decay in poles. Sounding a pole with a hammer, mechanical sounding tool, or electronic sonic pole tester will usually detect the presence of decay. Boring the suspect pole with a brace and bit or an increment borer will confirm the presence and determine the degree of the decay.

Determining the Serviceability of Decayed Poles

The decision to replace a decayed pole shall depend upon the remaining strength of the pole. The permissible reduced circumference of a pole is a good measure of serviceability.

Pole Circumference Safety Factors

Wood pole lines are designed using pole strength safety factors. For this bulletin, the groundline circumference of the pole will be used as a measure of pole strength. Table 1 shows the relationship between new pole circumferences, and reduced circumferences. Circumference reductions to compensate for other categories of decay, as shown in table 2, 3, and 4 should be applied to the circumferences in table 1 to determine the resultant reduced circumference.

If the reduced circumference is less than, or equal to the replacement circumference, the pole should be replaced.

5.0 RECORD KEEPING

The results of all cycle inspections and tests and corrective action taken shall be recorded, and retained for one complete cycle but not less than a period of six (6) years. Appropriate measures shall be taken on a timely schedule to correct any defects and/or deficiencies found on test or inspections. Inspection forms shall identify all poles/transformers visited. All non compliant findings shall be noted indicating corrective action to be taken and close out date (i.e., when corrective action was completed)

5.10 Forms

Forms to be used for inspection and record keeping purposes are included as Attachments A, B, and C.

6.1 PERFORMANCE MEASURES

6.10 Overview

Performance measures are intended to provide the means to monitor performance with respect to this guideline. The performance measures fall under three general categories, Plan and Progress Reporting, Effectiveness Metrics, and Efficiency Metrics.

Each DOC shall report the performance measures monthly. A quarterly Unitil System Summary shall consist of a consolidation of all three DOCs.

The following accounts shall be utilized for budgeting and tracking related cost and provides the data source for the Efficiency Metrics.

583.05	Overhead Dist. – Non-Maint. Area	OH Inspection cost - Unitil
583.06	Overhead Dist. – Maint. Area	OH Inspection costs – non-Unitil maint.
584.04	Underground Equip. Inspections	Underground Inspection costs

6.20 Plan and Progress Reporting

By January 1 of each year each DOC shall specify planned cycle inspection and pole testing work for the year. For each inspection category, the "Number in Service" shall also be updated as required.

Each month the actual work completed for each cycle inspection shall be reported and an indication of work schedule accuracy shall be calculated.

The following inspection categories shall be reported:

Manhole System Inspections
Underground Distribution Device Inspection
Overhead Distribution Inspection + Pole Test
(for Unitil maintenance area)
Overhead Distribution Inspection
(for non-Unitil maintenance area)

6.30 Effectiveness Metrics

One effectiveness metric for distribution inspections shall be reported – the **Pole Test Reject Rate**. This metric is tied to Pole Testing (Unitil

maintenance area) and requires the number of poles rejected per test be reported monthly.

6.40 Efficiency Metrics

The efficiency metrics for distribution inspections shall be as follows (requires monthly reporting of costs):

Underground Device Inspection - Cost per Device

Pole Inspection + Test – Cost per Pole
(Unitil maintenance area)

Pole Inspection – Cost per Pole
(Non-Unitil maintenance area

Table 1 – Pole Testing Table
Replacement based on remaining circumference at ground line

08/09/01

Pole Circumference (Installed)	Douglas Fir & Southern Yellow Pine		Western Red Cedar	
	Transmission	Distribution	Transmission	Distribution
30	21.4	23.8	19.5	21.6
31	22.2	24.6	20.1	22.4
32	22.9	25.4	20.8	23.1
33	23.6	26.2	21.4	23.8
34	24.3	27.0	22.1	24.5
35	25.0	27.8	22.7	25.2
36	25.7	28.6	23.4	26.0
37	26.4	29.4	24.0	26.7
38	27.2	30.2	24.7	27.4
39	27.9	31.0	25.3	28.1
40	28.6	31.7	26.0	28.8
41	29.3	32.5	26.6	29.6
42	30.0	33.3	27.3	30.3
43	30.7	34.1	27.9	31.0
44	31.4	34.9	28.6	31.7
45	32.2	35.7	29.2	32.5
46	32.9	36.5	29.9	33.2
47	33.6	37.3	30.5	33.9
48	34.3	38.1	31.2	34.6
49	35.0	38.9	31.8	35.3
50	35.7	39.7	32.5	36.1
51	36.4	40.5	33.1	36.8
52	37.2	41.3	33.8	37.5
53	37.9	42.1	34.4	38.2
54	38.6	42.9	35.1	38.9
55	39.3	43.7	35.7	39.7
56	40.0	44.4	36.4	40.4
57	40.7	45.2	37.0	41.1
58	41.4	46.0	37.7	41.8
59	42.2	46.8	38.3	42.5
60	42.9	47.6	39.0	43.3
61	43.6	48.4	39.6	44.0
62	44.3	49.2	40.3	44.7
63	45.0	50.0	40.9	45.4
64	45.7	50.8	41.6	46.2
65	46.5	51.6	42.2	46.9
66	47.2	52.4	42.9	47.6
67	47.9	53.2	43.5	48.3
68	48.6	54.0	44.2	49.0
69	49.3	54.8	44.8	49.8

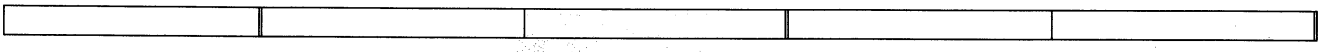
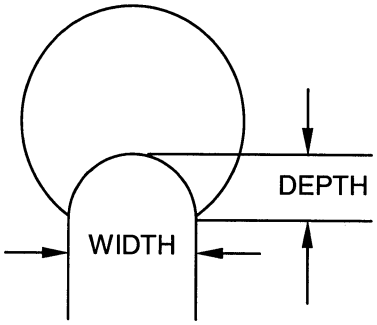
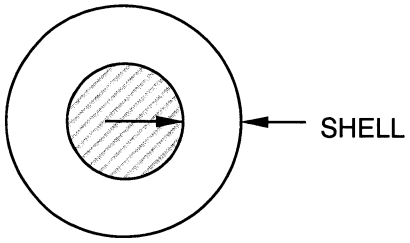


Table 2
Reduction in measured circumference of pole to compensate for external pocket



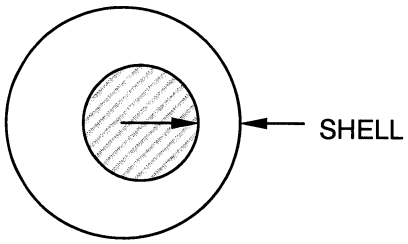
Width of pocket (inches)	1					2					3					4					5					6				
Depth of pocket (Inches)	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Measured circumference Of pole (inches)	Reduction in circumference (inches)																													
30 to 40	1	1	1	2	2	1	2	2	3	3	2	3	4	4	4	2	4	5	5	6	3	5	6	7	8	5	7	8	9	10
40 to 50	1	1	1	2	2	1	2	2	3	3	2	3	3	4	4	2	3	4	5	6	3	4	5	6	7	3	5	6	7	8
50 to 60	1	1	1	2	2	1	2	2	3	3	2	3	3	4	4	2	3	3	4	5	3	4	4	5	6	3	4	5	6	7

Table 3
Reduction in measured circumference of pole to compensate for hollow heart



Width of pocket (inches)	3	3 1/2	4	4 1/2
Measured circumference of pole (inches)	Reduction in circumference (inches)			
30 to 40	2	1	0	0
40 to 50	3	2	1	0
50 to 60	4	3	2	1

Table 4
Reduction in measured circumference of pole to compensate For enclosed pocket



Diameter of pocket (inches)	3			4			5		
Minimum thickness of shell (inches)	1	2	3	1	2	3	1	2	3
Measured circumference of pole (inches)	Reduction in circumference (inches)								
30 to 40	2	1	1	3	1	1	4	2	1
40 to 50	2	1	1	3	2	1	4	3	1
50 to 60	2	2	1	3	3	1	4	3	1

UNITIL MANHOLE / VAULT REPORT

Manhole/Vault #		Account #		Date:	

		Value	N/A	Yes	No
1	Manhole cover voltage check				
2	Oxygen Level (Acceptable range: 19.5 to 25%)				
3	Gas Level (Presence of gas requires ventilation)				
4	Manhole Dry				
5	Sump Pump Working				
6	Vault Lights Working				
7	Vault Outlets Working				
8	Primary Connections Okay				
9	Secondary Connections Okay				
10	Neutrals and Grounds Free of Corrosion				
11	Arcproofing Tape Installed on Primary Cable				
12	Circuit Labels and Tags Okay				
13	Cable Racks Okay				
14	Vac Pac Switches Okay				
15	Manhole Castings, Hatches, etc. Okay				

		Manual	Auto	Open	Closed
16	Circuit Protectors				
a	Operating Handle Position				
b	Protector Position				

		Value	Yes	No
c	Protector Okay			
d	Fuse Okay			
e	Counter Reading			
17	Transformers			
a	Record Number			
b	Transformer Okay			
c	Current Temperature			
d	Maximum Temperature			
e	Liquid Level - Main Tank			
f	Liquid Level - Primary Switch Comp.			
18	Primary Switch Okay			

			Open	Closed
19	Primary Switch Position			

20 Check Primary Connection Temperatures:

Location of Temp by Circuit #	Temp	Location of Temp by Circuit #	Temp
A		M	
B		N	
C		O	
D		P	
E		Q	
F		R	
G		S	
H		T	
I		U	
J		V	
K		W	
L		X	

Comments:

UNITIL UNDERGROUND DISTRIBUTION FACILITIES INSPECTIO

Five-Year Public Safety Inspection

A visual safety inspection of underground equipment to be performed every five years

Date:		**Inspected By:**	
Legend:	**N/A =** Not Applicable, ✓ = Checked OK, **X** = Needs Attention for specific refer to comments / notes		

Town Code	Location	Pole Number	Installed Date	Unit	Primary Voltage	Secondary Voltage	Phase	Type	Switching Cabinet	Decals warning signs	Pad lock / one time locks	Penta head locking bolt	Condition of unit	Aligned properly	No holes	Free from rust	No visible oil leaks	No excessive gap in doors	Traffic Barriers	Vegetation Clearance

UNITIL OVERHEAD DISTRIBUTION AND POLE TEST REP

Ten-Year Public Safety Inspection & Ten-Year Pole Test

A visual safety inspection of overhead distribution facilities to be performed every ten ye

Date:		**Inspected By:**	
Legend:	**N/A =** Not Applicable, ✓ = Checked OK, **X** = Needs Attention for specific refer to comments / notes		

Town Code	Location	Pole Number	Year Installed	Plant unit	Class	Type	Vegetation Clearance	Wire Proper Height	Equipment	Pole / Arm	Transformer(s) Condition	Anchor / Guys	Climbing Steps	Reflectors	Foreign Attachments	CATV Auth.	Telephone Auth.	Test

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Record Request No. DTE-1-7

Please detail the training requirements for employees likely to be performing work with, one, electric distribution company systems for both internal and external employees and contractors and, two, local gas distribution company systems, for both internal and external employees.

Response:

With respect to employees likely to be performing work with electric distribution company systems, Unitil requires the following training:

Internal employees: Unitil utilizes a 42 month on-the-job apprenticeship training program. Employees are trained to be compliant with OSHA regulations, such as, but not limited to: confined spaces, manhole rescue, air quality testing, etc.

External employees: In order for outside contractors to be considered as qualified to perform work on the Unitil system, Unitil requires external employees to comply with and/or be trained in:

- OSHA regulations
- DOT regulations
- First aid
- Rubber gloving methods
- Confined space
- Manhole rescue
- CPR
- Traffic safety
- Hazardous materials

Unitil provides external employees with job-specific training in order to ensure external employees are aware of the hazards involved with each project.

With respect to employees likely to be performing work with gas distribution company systems, Unitil requires the following training:

Internal employees: Internal employees are subjected to a comprehensive training program. This training program utilizes on-the-job training as well as classroom in instruction, including hands-on techniques in a structured environment. In addition, all employees are issued an Operation and

Maintenance Manual which is reviewed on a periodic basis. Employees are also required to be Operator Qualified as outlined in CFR 192.

Contract employees are required to be Operator Qualified in all aspects of distribution activities and are issued Company Operation and Maintenance Manuals which are reviewed prior to each construction season.

Person Responsible: Chris Dube, Chris Leblanc **Date:** September 21, 2005

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Record Request No. DTE-1-8

What specific training requirements, if any, should be considered by the Department for the groups mentioned in Record Request No. 7, above? (Internal and external employees and contractors for both the electric distribution company and gas distribution company.)

Response:

Unitil does not recommend that the DTE establish guidelines mandating utilities adopt specific training requirements, as this would limit the flexibility and management discretion which individual utilities require in order to provide employees with the unique training needs that are specific to the various distribution systems.

Person Responsible: Chris Dube and Chris Leblanc **Date:** September 21, 2005

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Record Request No. DTE-1-12

Is there any third party audit (by either independent companies or regulatory agencies) of the company's pipelines or other gas facilities for leaks?

Response:

State Pipeline and Safety Engineers conduct independent audits of Unitil's gas leak repair program under the authority of the Massachusetts Department of Telecommunication and Energy. These reviews are performed in conjunction with periodic inspections of all distribution operations. The inspections occur at random throughout the year, usually at intervals of twice per month.

Person Responsible: Chris LeBlanc **Date:** September 21, 2005